

UNITED STATES DISTRICT COURT

for the

District of South Carolina

In the Matter of the Seizure of
 (Briefly describe the property to be seized)
 All contents of Bank of America account
 325074180932

)
)
)
)
)

Case No.

6:24cr 913

**APPLICATION FOR A WARRANT
 TO SEIZE PROPERTY SUBJECT TO FORFEITURE**

I, a federal law enforcement officer or attorney for the government, request a seizure warrant and state under penalty of perjury that I have reason to believe that the following property in the _____ District of _____ South Carolina is subject to forfeiture to the United States of America under _____ 18 U.S.C. § 981, 982 (describe the property):

Bank of America account 325074180932 or funds held in suspense due to account closure, held under the business name AION GLOBAL LLC, and titled to YING XUE

The application is based on these facts:
 See attached affidavit.

☒ Continued on the attached sheet.



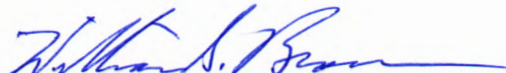
Applicant's signature

USSS T.F.O. David Paramore

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/29/2024



Judge's signature

City and state: Greenville, SC 29601

US Magistrate William S. Brown

Printed name and title

AFFIDAVIT

I, David R. Paramore, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Task Force Officer with United States Secret Service South Carolina Cyber Fraud Task Force ("USSS SC CFTF") and have been so employed since January 2022. I am currently assigned to the Greenville Residence Office to perform duties as a Task Force Officer (TFO) and investigate financial crimes to include wire fraud, identity theft, credit card fraud, bank fraud, crypto-currency fraud, and money laundering. I am currently employed at the city of Greenville Police Department and have been so employed since June, 2009. I am currently assigned to the Criminal Investigations Division since June, 2017, under the Economic Crimes Unit. As an Economic Crimes Detective, I have received training at the South Carolina Criminal Justice Academy. This training covered aspects of criminal investigation and law enforcement. I have participated in numerous investigations of violations of criminal law including matters involving fraud and white-collar crimes. I have attended numerous training courses involving financial related crimes and crimes involving cryptocurrency.

II. PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of an application for a warrant to seize the following (the "Subject Funds"):

Any and all United States Currency in the suspect's Bank of America Account #325074180932 (the "Subject Account"), and under the business name AION GLOBAL LLC, and titled to Ying Xue.

1 3. As described more fully below, there is probable cause to
2 believe that the Subject Funds represent the proceeds of one of more
3 violations of 18 U.S.C. § 1343 (Wire Fraud), 18 U.S.C. § 1956 (Money
4 Laundering), or a conspiracy to commit the same, (the "Subject
5 Offenses"), committed by unknown persons and transferred into the
6 AION GLOBAL LLC account and are therefore subject to seizure pursuant
7 to 18 U.S.C. § 981(b) and forfeiture pursuant to 18 U.S.C. §
8 981(a)(1)(A) & (C).

9 4. In addition, there is probable cause to believe that the
10 Subject Funds are subject to seizure and forfeiture to the United
11 States pursuant to 18 U.S.C. § 982 and 21 U.S.C. § 853(f) because the
12 property would, in the event of conviction on the alleged underlying
13 offenses, be subject to forfeiture, and an order under section 21
14 U.S.C. § 853(e) would not be sufficient to assure the availability of
15 the property for forfeiture.

16 5. The facts set forth in this affidavit are based upon my
17 personal observations, my training and experience, bank
18 investigators, and information obtained from various law enforcement
19 personnel and witnesses. This affidavit is intended to show merely
20 that there is sufficient probable cause for the requested warrants
21 and does not purport to set forth all of my knowledge of, or
22 investigation into, this matter.

23 6. Unless specifically indicated otherwise, all conversations
24 and statements described in this affidavit are related in substance
25 and in part only, and all dates and amounts are approximations.

26 **III. SUMMARY OF PROBABLE CAUSE**

27 7. USSS and local law enforcement agencies are investigating
28 an unknown international criminal organization, who through means of

1 a cyber scheme received proceeds from a Business Email Compromise
2 (BEC) fraud scheme. Bank fraud investigators flagged the funds sent
3 by the victim as indicative of fraudulently obtained funds and placed
4 a hold placed on the account.

5 8. As set forth below, the Subject Account was used by the
6 suspect(s) to receive the proceeds of the above-described scheme.
7 Therefore, there is probable cause to believe that the Subject Funds
8 are subject to seizure and forfeiture by the United States.

9 **IV. STATEMENT OF PROBABLE CAUSE**

10 9. Based on witness interviews, documents obtained from third
11 parties, reports of interviews conducted by other law enforcement
12 officers, conversations with other law enforcement officers, and
13 publicly filed documents, I know the following:

14 **A. Background on Business Email Compromise Schemes**

15 Often in Business Email Compromise schemes, the victim's own
16 email is compromised and the scammers interject themselves into what
17 is often a business transaction. At the opportune time, they provide
18 payment information, often in an altered invoice, to have the
19 unwitting victim wire funds directly to the scammer or some other
20 laundering account. In doing so, the victim believes the funds were
21 sent to the correct person and it is often not discovered until
22 enough time has passed to allow the suspect to withdraw the funds.

23
24 **B. Theft and Business Email Compromise Scheme from Victim
25 G.N.**

26 10. Based on conversations, emails and documents received
27 during this investigation, I learned the following:
28

1 a. On or about January 5, 2024, G.N. a resident of
2 Easley, SC began correspondence through email with a closing agent
3 regarding the purchase of a yacht from an online listing. The
4 victim's email address used in the correspondence was
5 bennett@nalleyproperties.com. The email address of the closing agents
6 provided to the victim was jdouglas@unitedyahct.com and
7 kathy@unitedyahctsales.com. G.N. began communicating with someone
8 who was purporting to be the closing agent with "United Yahct
9 Brokerage." Communication occurred over multiple email chains
10 between G.N. and who he thought was the closing agent. At this time,
11 the illicit actors posing as the closing agent began to convince G.N.
12 that he would need to wire the funds based on the instructions
13 provided, in the amount of \$303,325.00. The victim (G.N.) traveled to
14 his local branch and made a wire transfer from his two Wells Fargo
15 accounts #30979281 and #37598596, which resulted in the fraudulent
16 transfer of approximately \$606,650.00 (split equally into two wire
17 transfers) on August 15, 2024 to Truist account #1440018025936. The
18 scammers then made a wire transfer in the amount of \$320,000.00 into
19 a PNC Bank account between 08/16/2024 and 08/22/2024. Three days
20 later, \$300,000.00 (of the original \$320,000 wire transfer) was
21 transferred from the PNC Bank account to Bank of America account
22 #325074180932 (Subject Account). An attorney representing the
23 victim, contacted the United States Secret Service Greenville
24 Resident Office to report that his victim (G.N.) had fallen prey to a
25 business email compromise and provided supporting documents.

26 b. On October 25, 2024, I obtained a federal seizure
27 warrant for the approximately \$20,000 in fraud proceeds that remained
28 in the PNC Bank account. The remainder of the funds held in suspense

1 in the Bank of America Subject Account, were frozen by bank
2 representatives due to suspected fraud. Bank records showed that
3 funds from the Subject Account were being sent directly to Hong Kong
4 and Shanghai Banking Corporation of China. A further check into the
5 financial system, identified that the Subject Account and account
6 holder have been the subject of numerous other bank reports.

7 c. I reviewed the records for the Subject Account, Bank
8 of America, account #325074180932, which show that the Subject Account
9 is held in the name of AION GLOBAL LLC and is titled to YING XUE. The
10 activity in the account appears to be suspicious in nature, with
11 funds being wired in and almost immediately wired out, or otherwise
12 withdrawn, going directly to China showing a clear money laundering
13 operation. No other source of funding appears to occur in the account
14 during the relevant time frame.

15 d. Bank of America continues to hold a portion of the
16 original \$300,000 transfer in the Subject Account.

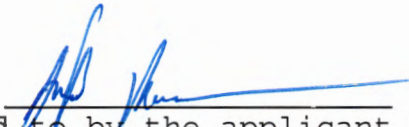
17
18
19 V. CONCLUSION

20 11. Based on the facts set forth above, there is probable cause
21 to believe that the Subject Funds are subject to seizure pursuant to
22 18 U.S.C. § 981(b) and forfeiture pursuant to 18 U.S.C.
23 § 981(a)(1)(C) (rendering subject to forfeiture any property that
24 constitutes or is derived from proceeds traceable to a violation of
25 18 U.S.C. § 1343), and § 982 (criminal forfeiture).

26 12. Based on my training and experience, I know that
27 restraining orders served on banks sometimes fail to preserve the
28 property for forfeiture because the bank representative receiving the

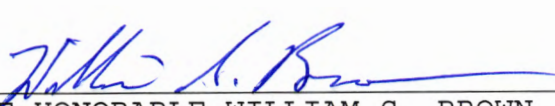
1 restraining order fails to put the necessary safeguards in place to
2 freeze the money in time to prevent the account holder from accessing
3 the funds electronically, or fails to notify the proper personnel as
4 to the existence of the order, or the bank exercises its own right of
5 setoff to satisfy an outstanding debt owed to the bank by the account
6 holder. In contrast, where electronic funds are concerned, a seizure
7 warrant guarantees that the funds will be in the Government's custody
8 once the warrant is served.

9 13. This affidavit has been reviewed by Assistant U.S. Attorney
10 Carrie Fisher Sherard.

11 
12 Attested to by the applicant in
13 accordance with the requirements of
14 Fed. R. Crim. P. 4.1

15 David R. Paramore
16 USSS Task Force Officer

17 Subscribed to and sworn this 29th
18 day of October, 2024.

19 
20 THE HONORABLE WILLIAM S. BROWN
21 UNITED STATES MAGISTRATE JUDGE
22
23
24
25
26
27
28